

CPNI Procedures

DoveTel Communications, LLC ("DoveTel") has adopted and complies with the following operating procedures to protect the confidentiality of (1) information that relates to the quantity, technical configuration, type, destination, location, or amount of use of the telecommunications services to which its customers subscribe and (2) information contained in bills pertaining to telecommunications services that it provides to its customers (collectively, "Customer Proprietary Network Information" or "CPNI") and to ensure that DoveTel complies with the Federal Communications Commission's CPNI rules:

- DoveTel stores all CPNI on a secure computer network.
- DoveTel does not use any CPNI for any marketing purpose.
- DoveTel does not use CPNI for any purpose other than (1) to provide the telecommunications service from which such information is derived, (2) to initiate, render, bill, and collect for such telecommunications services, and (3) to protect the rights or property of DoveTel, or to protect users of DoveTel's services and other carriers from fraudulent, abusive, or unlawful use of, or subscription to, such services.
- Except as provided in the immediately preceding paragraph, DoveTel does not release any CPNI to third parties for any purpose except in response to legal process.
- DoveTel does not use, disclose or permit access to CPNI to identify or track customers that call competing service providers.
- DoveTel does not release any customer's CPNI to that customer except after positive confirmation of the customer's identity.
- DoveTel's new hire process includes employees being trained on and signing DoveTel's CPNI policy.
- DoveTel provides periodic training to its employees concerning the importance of maintaining the confidentiality of its customers' CPNI and the required procedures for ensuring compliance with the CPNI rules.
- DoveTel employees are subject to disciplinary action, including termination in appropriate cases, for violations of DoveTel's CPNI confidentiality policy.
- Any use or release of any CPNI by any DoveTel employee requires the approval of a supervisor who is knowledgeable concerning DoveTel's CPNI policies and the requirements of the CPNI rules.

- DoveTel requires all customers to use a password, or visit our retail office, or have an authorized DoveTel representative call the customers telephone number of record served by DoveTel, or in the case of Business accounts with dedicated points of contact and a dedicated DoveTel support team who have contractual verbiage concerning CPNI access in their service agreement with DoveTel to access any CPNI. All passwords are secure and protected from any outside or inside attack.
- DoveTel requires each customer to identify himself or herself to an employee of DoveTel using information previously provided by the customer.. DoveTel does not reset passwords based upon readily available biographical information or account information.
- DoveTel keeps logs of all transactions that impact CPNI either by the customer directly using a DoveTel portal or by a DoveTel employee.



Date: May 31st, 2016

Document Type: **Policy ensuring that the Operating Procedures of DoveTel Communications LLC (DoveTel) comply with Commission's strengthened privacy rules, pursuant to section 222 of the Communications Act, as amended, adopting additional safeguards to protect CPNI against unauthorized access and disclosure under 47 C.F.R Paragraph 64.2009(e).**

Document Number: **FCC-CPNI-POLICY-05312016**

DoveTel's Customer Private Network Information (CPNI) policy prohibits the use of CPNI information for any sales and marketing purposes. DoveTel's CPNI policy is simple, DoveTel Communications, LLC, does **NOT** use CPNI information for sales, marketing, or any purpose other than what is necessary for provisioning of services as specified in Section 222 of the Communications Act of 1934, Section 222 Commission's Subpart U(Customer Proprietary Network Information) and makes a determined effort to prevent unauthorized access and disclosure by adopting additional safeguards to protect CPNI as recommended by the Federal Communications Commission (Commission).

CPNI is defined by 47 U.S.C. § 222 (h). The term Customer Proprietary Network Information (CPNI) means (a) information that relates to the quantity, technical configuration, type, destination, location, and amount of use of a telecommunications service subscribed to by any customer of a telecommunications carrier, and that is made available to the carrier by the customer solely by virtue of the carrier customer relationship; and (b) information contained in the bills pertaining to telephone exchange service or telephone toll service received by a customer of a carrier; except that such term does not include subscriber list information.

DoveTel's CPNI policy is reviewed and policed by the CEO and Executive Staff throughout each year and with the applicable DoveTel staff having access to customer CPNI. Each of DoveTel's staff having access to customer CPNI is required to read, understand, and sign a copy of the current DoveTel CPNI policy. This signed policy is filed in each staff-member's personnel record file. Each time DoveTel's CPNI policy changes, the staff having access to customer CPNI are required to sign the then current CPNI policy.

Suspected violations of this policy will initiate an immediate executive review. Staff found willfully violating this policy will be terminated. Other violation occurrences will be addressed accordingly on a case-by-case basis. Each violation will be documented at the company level and in the offending staff-member's personnel file.

DoveTel's CEO will sign and file as an Agent an annual Compliance Certificate with the Commission. A statement explaining how DoveTel's operating procedures ensure that it is in compliance with CPNI rules will also be filed. This filing will be made on or before March 1st in EB Docket No. 06-36 for data pertaining to the previous calendar year.

CPNI Safeguard and Associated Documentation Procedures

DoveTel's policy is as follows concerning the release of any Customer's CPNI for the purpose of establishing the validity and authority of customer's CPNI approval prior to the release of CPNI and the documentation of such release. This applies to any release of CPNI including directly with the customer requesting or addressing its CPNI.

DoveTel must properly authenticate a customer prior to disclosing CPNI. All instances of CPNI released (authorized and un-authorized) must be documented in DoveTel's database repository (SCRIBE). Only authorized DoveTel personnel can validate and release CPNI. Likewise, these authorized individuals are those having access to the SCRIBE interfaces for documenting all CPNI. NOTE: Some references to SCRIBE may be implemented with spreadsheet and Word documentation during times of SCRIBE updates, upgrades, etc.

Authorized methods for release of CPNI

In all methods the DoveTel representative validating and releasing CPNI must document the applicable information in SCRIBE such as customer representative's ID information, account information, scanned picture of the photo ID, date(s) of CPNI release(s) and description of the nature of the request for CPNI.

- 1) DoveTel may release CPNI to a customer who, at DoveTel's retail location, first presents to DoveTel a valid photo ID matching the customer's account information.
- 2) DoveTel may release CPNI to a customer based on a customer-initiated telephone contact if the customer first provides the carrier with a password. The password must be of the form described in this policy.
 - a. The DoveTel representative validating the customer's password must document that the password is correct in SCRIBE.
 - b. If the customer is able to provide call detail information to DoveTel during a customer-initiated call, without DoveTel's assistance, then DoveTel can discuss the call detail information provided by the customer.
 - c. If the customer has forgotten his password, the DoveTel representative may follow one of the other authorized processes for releasing CPNI. The DoveTel representative may also initiate a call to the customer's telephone number of record and request a new password from the customer.
 - i. The password must be of the form described in this policy.
 - ii. The Customer Notification section of this policy for account changes must be followed.
- 3) DoveTel may release CPNI to a customer by sending it to the customer's address of record.
- 4) DoveTel may release CPNI to a customer by calling the customer at the telephone number of record.
- 5) DoveTel may release CPNI to Business Customers when the communication or release of CPNI is between a pre-identified, dedicated DoveTel support team member(s) and a pre-identified and valid Business Customer contact(s) provided the Business Customer has signed a contract or addendum to an existing contract specifically addressing the Business Customer's protection of CPNI.
 - a. The DoveTel sales representative responsible for a Business Customer must document in SCRIBE whether or not a particular Business Customer has a contract or addendum to an existing contract specifically addressing CPNI.
 - b. DoveTel support representatives must verify with SCRIBE that the Business Customer has a contract or addendum to an existing contract specifically addressing CPNI before utilizing this method for releasing CPNI.

- 6) DoveTel may allow a customer online access to CPNI information by first authenticating the customer by one of the aforementioned methods listed in this section of this policy, then by providing an online user name and password to the customer.
 - i. The password must be of the form described in this policy.
 - ii. The Customer Notification section of this policy for account changes must be followed.

Establishment of Password Provisions

DoveTel may establish a password with the customer, after the customer is authenticated, without the use of readily available biographical information or account information.

- a. This authentication may be in the form of the non-password methods for releasing CPNI in this policy.
- b. For new customers, DoveTel may request that the customer establish a password at the time of service initiation.
- c. DoveTel may only accept or create “strong” passwords. Weak or “friendly” passwords are not allowed.
- d. Any new password created or changed must be documented in the applicable area of SCRIBE, to include: customer information, date of creation, customer contact establishing password, the password itself, and any relevant notes.
- e. The Customer Notification section of this policy for account changes must be followed.

Customer Notifications of Account Changes

DoveTel staff (Sales and Operations) making any CPNI changes per this policy must notify the following designated contact general mailbox with the particulars of the change within one business day of the change.

The designated contacts associated with this mailbox are responsible for notifying the customer of the applicable account change. Applicable changes are password changes, address of record changes, and network changes (physical and provision). Customer notifications are not required when the customer initiates service, including the selection of a password at service initiation.

The designated contacts may notify the customer through the following mechanisms; however, the changed information must not be revealed or sent to the new account information.

- a. DoveTel originated voicemail
- b. Text message
- c. The telephone number of record
- d. By mail to the address of record

The designated contacts must update SCRIBE with the mechanism used, and the particulars of the notification in SCRIBE.

Designated contacts general mailbox: CNcontact@syncglobal.net

Disclosing CPNI to independent contractors or joint venture partners for the purpose of marketing communications related services

It is DoveTel’s policy **NOT** to disclose CPNI to a DoveTel partner or independent contractor for the purpose of marketing communications-related services.

Should DoveTel's policy change to allow this type of marketing, it will also incorporate Opt-in and Opt-out provisions for both DoveTel and the customer complying with the applicable provisions of 47C.F.R §64.2009 ensuring that a customer must Opt-in before its CPNI is used for this purpose and that such customer Opt-in and Opt-out elections are documented for a minimum of one year.

Any such future policy modification will include additional supervisory review provisions to ensure compliance with the rules in 47C.F.R §64.2009 applicable to outbound marketing situations and the maintaining of compliance records for a minimum of one year.

Consumer Complaints

DoveTel staff must notify DoveTel's CEO with a written description of all consumer complaints concerning CPNI information within one business day. DoveTel's CEO will file these complaints and report where necessary to the Commission.

CEO

Kyle Williamson

Office: 678-821-1110

Email: kyle_williamson@syncglobal.net

CPNI violation attempts

DoveTel staff must notify DoveTel's CEO with a written description of all CPNI violation attempts. This includes pre-texting attempts to gain CPNI information.

CEO

Kyle Williamson

Office: 678-821-1110

Email: kyle_williamson@syncglobal.net

CPNI Breach Provisions

DoveTel staff must notify DoveTel's CEO and Vice President of Sales immediately upon the occurrence of breach of any CPNI. A "breach" has occurred when a person, without authorization or exceeding authorization, has intentionally gained access to, used, or disclosed CPNI. The DoveTel staff must **NOT** notify the customer of the breach.

No later than seven business days after a "reasonable determination of a breach", DoveTel's CEO must send electronic notification to a central reporting facility of the U.S. Secret Service ("USSS") and the FBI. The Commission maintains a link for this purpose at <http://www.fcc.gov/eb/cpni>.

Seven business days after notifying the USSS and FBI, DoveTel's CEO may notify the customer and/or disclose a breach publicly, provided the USSS and FBI have not requested that DoveTel further postpone disclosure. The USSS or FBI may direct DoveTel to postpone disclosure for an additional thirty-day period, which may be extended as reasonably necessary in the judgment of the USSS and FBI.

NOTE: DoveTel's CEO may allow immediate disclosure if he believes there is an "extraordinarily urgent need" to notify the customer or class of customers to avoid "immediate and irreparable harm."

DoveTel's CEO will document and record the breach incident. The incident will be recorded for a minimum of two years. The recording will include (if available) the date discovered, the date of notification to the USSS

and FBI, a detailed description of the CPNI that was breached, circumstances of the breach, data, customer information, and customer communications, as applicable.

CEO

Kyle Williamson

Office: 678-821-1110

Email: kyle_williamson@syncglobal.net

Vice President of Sales

Jim Clotfelter

Office: 678-821-1121

Email: jim_clotfelter@syncglobal.net

Name: Kyle Williamson

Signed: _____

Title: CEO

Date: _____

I agree to the conditions of the above stated policy:

Employee Name: _____

Employee Signature: _____

Employee Title: _____

Date of Signature: _____